

## PHYSICAL RECORDS DISPOSITION PROCEDURE

This procedure is governed by its parent policy. Questions regarding this procedure are to be directed to the identified Procedure Administrator.

<b>Functional Category:</b>	Operations
<b>Parent Policy:</b>	Records and Information Management Policy
<b>Approval Date:</b>	May 31, 2021
<b>Effective Date:</b>	May 31, 2021
<b>Procedure Owner:</b>	Vice President, People and Culture
<b>Procedure Administrator:</b>	Manager, Compliance

### Overview:

The purpose of this procedure is to provide information for the NorQuest College (college) staff assigned with responsibility of managing official records and disposing of official records from onsite. It provides instructions for preparing official records for final disposition that are located onsite.

Authority to establish this procedure is derived from the [NorQuest College Board of Governors Policy No. 5](#), which delegates authority to the President and CEO to establish policies and procedures for the college's management and operation.

### Procedures:

#### General Conditions

- All records in the custody and control of the college shall be managed in accordance with the Records and Information Management Policy and the Records Retention and Disposition Schedule (Retention Schedule).
- Physical official records must be disposed of according to this procedure.
- Executive or Divisional Head approval is required to dispose of official records. Divisional Heads will sign off on official records created by a department or a division. Executive Heads will sign off on official records created at the portfolio level. If necessary, Executive Heads may sign off on department or divisional official records, in lieu of a Divisional Head.
  - Approval is to be based on the current, approved Records Retention and Disposition Schedule as well as consideration for legal purposes, audit purposes, investigations, student appeals, active requests for access to information, or other matters that may necessitate the retention of official records to deal with issues affecting the college.
  - Official records will not be destroyed, selectively retained, or permanently preserved without written authorization.

Official records must be retained for the full duration of their retention period, as defined by the Retention Schedule. Once the retention period has elapsed, the official record is eligible for destruction or transfer to the archives. The retention period begins to count down only after the Trigger Event defined in the Retention Schedule has occurred.

Compliance will annually initiate the disposition of official records. Departments are responsible for annually participating in the onsite disposition of official records.

The disposition process for official records depends on where the official records are located.

- See **DESTRUCTION OF RECORDS LOCATED IN THE RECORDS CENTRE** for records that are on campus in the Records Centre.
- See **DESTRUCTION OF RECORDS LOCATED ONSITE** for records that are on campus and not in the Records Centre.

### **DESTRUCTION OF RECORDS LOCATED IN THE RECORDS CENTRE**

#### **Step 1 - Evaluation**

Official records located in the Records Centre that are eligible for disposition will be noted in the NorQuest Semi-active and Inactive Box Tracking Database.

#### **Step 2 – Certification**

To facilitate disposition, an internal Records Destruction Certificate will be prepared by Compliance. The certificate will list the box numbers, file descriptions, and scheduled destruction dates of the material.

#### **Step 3- Authorization**

The Executive or Divisional Head will be presented with the Records Destruction Certificate and Records Inventory for final signoff. Departments are responsible for reviewing the documentation and alerting Compliance if there are any official records that require further care before disposition.

#### Approval Denied

Where the Executive or Divisional Head has identified files that cannot be destroyed according to the Retention Schedule, the Executive or Divisional Head is to describe the reason in the “Approval Denied” and “Denial Description” columns of the Records Inventory, according to the criteria listed below:

- Legal issue
- Audit purposes
- Investigations
- Student Appeals
- FOIP Request
- Other valid reasons

Provide details and send all of the forms to Compliance.

Regarding disposition exceptions, Compliance will remove selected files from the box, and process the files as instructed (e.g. box for additional storage or provide for inclusion in active official records) and resubmit the modified Records Inventory and Records Destruction Certificate to the Executive or Divisional Head for approval.

#### Retention Series Code requires Amending

Where the Executive or Divisional Head has identified that a Retention Series Code change is required, Compliance will update the Record Inventory for all changes identified by the Executive or Divisional Head, remove selected files from the boxes, re-box files, and resubmit the modified record inventory to the Executive or Divisional Head for approval.

#### **Step 4 - Destruction**

Compliance will:

- contact Facilities who will contact the shredding company to initiate the onsite confidential shredding of official records,
- observe the shredding company loading and shredding of boxes,
- have the shredding company sign a destruction certificate or obtain a destruction certificate from the shredding company, showing that the official records have been destroyed, and
- file and manage all related official records.

Once destruction has occurred, Compliance maintains the internal Records Destruction Certificate and the shredding company's destruction certificate as a permanent record of the destruction of the official records.

### **DESTRUCTION OF RECORDS LOCATED ONSITE**

#### **Step 1 - Evaluation**

If official records were not transferred to the Records Centre, they will not be detailed in the NorQuest Semi-active and Inactive Box Tracking Database. Departments are responsible for monitoring onsite official records that are eligible for destruction.

#### **Step 2 – Preparation**

Contact Compliance to ask for a current copy of the Retention Schedule, the Records Inventory, and boxes to pack up the material.

#### **Step 3 – Retention Schedule Review**

Determine whether or not there is an approved Retention Schedule that covers the official records being destroyed. Consult the Retention and Disposition Schedule. Official records will not be disposed of without an approved Retention Schedule.

#### **Step 4 – Official Records and Box Preparation**

Gather official records, files, and boxes.

- Place official records in files. Name files appropriately.
- Order files according to alphabetical listing, date, or subject.
- Place files in boxes.
- Using the Retention Schedule, group official records from the same record series.
- All material should be boxed according to the box's final status: destruction, archival selection, or permanent preservation.

- Remove and destroy transitory records. Transitory records do not need to be inventoried and formally destroyed.
- Remove official records and files from binders, binding cases, or hanging file folders.
- Elastics or colored paper can be used to subdivide each file, and separate contents if necessary.
- Do not write on the box.
- Ensure boxes are as full as possible.

### **Step 5 – Records Inventory Creation**

Create a Records Inventory.

- Unless otherwise indicated, all fields are required.
- List each description in its designated area.
- Add all files to the Inventory in the same order as they are in the boxes.
- File titles listed on the Inventory should identically match the titles on the physical files.
- Enter dates as MM/DD/YYYY.
  
- Use the Retention Schedule to determine the:
  - Series code (ex. SA001)
  - Final status (Destroy, Archival Selection, Permanent)
  - Eligible disposal date

After filing and inventorying, ensure that all titles, descriptions, and codes are accurate.

### **Step 6 – Records Inventory Review and Authorization Request**

Contact Compliance to review and approve the populated Records Inventory.

Contact Compliance with the following information:

- Date of the request
- The room and area the boxes are located in
- The number of boxes for pick up and the number of bar codes required
- The populated Records Inventory

### **Step 7 – Authorization on Records Inventory**

Seek approval on Records Inventory from Compliance. Compliance will review and approve. Upon approval, Compliance will provide a Unique Bar Code for each box.

### **Step 8 – Certification**

Once the official records have been inventoried and approved, a Records Destruction Certificate will be prepared by Compliance. The certificate will list the box numbers, file descriptions, and scheduled destruction dates of the material.

### **Step 9 - Authorization on Destruction**

The Executive or Divisional Head will be presented both with the Records Destruction Certificate and Records Inventory for final signoff. Departments are responsible for reviewing the documentation and alerting Compliance if there are any official records that require further care before disposition.

#### Approval Denied

Where the Executive or Divisional Head has identified files that cannot be destroyed according to the Retention Schedule, the Executive or Divisional Head is to annotate the reason in the "Approval Denied" and "Denial Description" columns of the Records Inventory, according to the criteria listed below:

- Legal issue
- Audit purposes
- Investigations
- Student Appeals
- FOIP Request
- Other valid reasons

Provide details and send all of the forms to Compliance.

Regarding disposition exceptions, Compliance will remove selected files from the box, and process the files as instructed (e.g. box for additional storage or provide for inclusion in active official records) and resubmit the modified Records Inventory and Records Destruction Certificate to the Executive or Divisional Head for approval.

#### Retention Series Code requires Amending

Where the Executive or Divisional Head has identified that a Retention Series Code Change is Required, Compliance will update the Record Inventory for all changes identified by the Executive or Divisional Head, remove selected files from the boxes, re-box files and resubmit the modified record inventory to the Executive or Divisional Head for approval.

### **Step 10 – Transfer**

After the department has signed off on the disposition, the boxes are sent to the Records Centre. Files that are scheduled for archival selection or permanent retention will be physically reviewed by Compliance to determine if the official records hold any historical value to the institution. Any official records deemed to have historical value are transferred to the archives for preservation. All other files will be shredded by a third-party shredding company.

### **Step 11 - Destruction**

Compliance will:

- contact Facilities who will contact the shredding company to initiate the onsite confidential shredding of records,
- observe the shredding company loading and shredding of boxes,

- have the shredding company sign a destruction certificate or obtain a destruction certificate from the shredding company, showing that the records have been destroyed and,
- file and manage all related records.

Once destruction has occurred, Compliance maintains the internal Records Destruction Certificate and the shredding company's destruction certificate as a permanent record of the destruction of the records.

**Definitions:**

**Archives:** a place where official records selected for permanent preservation are kept.

**Archivist:** a professional educated in archival science and responsible for the administration of archives.

**Division Head:** means anyone who manages a division or multiple divisions. Division Head is responsible for a division(s) reporting directly to an executive and normally includes Deans and Directors but may also include an executive or senior manager.

**Executive Head:** means anyone who manages a division(s) and is a member of the Executive Team.

**File:** a group of records related by use or topic, typically housed in a folder (or a group of folders for a large file).

**Inactive Record:** a record that is no longer used in the day-to-day course of business, but which may be kept and occasionally used for legal, historical, or operational purposes.

**Official Record:** a complete, final, and authorized version of a record. Provides evidence of business transactions, is required by legislation, provides evidence of compliance with business requirements, and contributes to the building of NorQuest College's memory for scientific, cultural, or historical purposes.

**Semi-active Record:** a record which is no longer needed for the purpose of carrying out the action for which it was created, but which is needed by the records creator for reference. Semi active records are only referred to on an infrequent basis (e.g. seasonally, annually).

**Transitory Record:** are records in any format that are of short-term value, with no further uses beyond their primary purpose.

**Related NorQuest College Information:**

- Box Identification Label (available from Compliance)
- [NorQuest College Retention and Disposition Schedule](#)
- [Records and Information Management Policy](#)
- [Records and Information Management Toolkit](#)
- Records Destruction Certificate (available from Compliance)

<b>Related External Information:</b>
<b>Next Review Date:</b>
<b>Revision History:</b>

- [Records Inventory and Records Inventory Guidelines](#)
- [Freedom of Information and Protection of Privacy Act](#)

May 2025

April 2017: new

December 2017: updates to box preparation and inventory creation sections

August 2019: Compliance Office template & reorganization update

May 2021: update because NorQuest no longer uses offsite storage, and to distinguish between official and transitory records